

NOT YET SCHEDULED FOR ORAL ARGUMENT
No. 23-5236

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff – Appellant

v.

UNITED STATES PARK POLICE

Defendant – Appellee

ON APPEAL FROM THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA (Case No. 19-cv-1502)

**NOTICE BY NATIONAL POLICE ACCOUNTABILITY PROJECT
OF INTENT TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF
PLAINTIFF-APPELLANT AND REVERSAL**

Keisha James
PO Box 56386
Washington, DC 20040
keisha.npap@nlg.org
(202) 557-9791

Lauren Bonds
Eliana Machefsky
National Police Accountability Project
1403 Southwest Boulevard
Kansas City, Kansas 66103
legal.npap@nlg.org
fellow.npap@nlg.org

Counsel for Amicus Curiae

CORPORATE DISCLOSURE STATEMENT

Pursuant to Federal Rule of Appellate Procedure 26.1 and Circuit Rule 26.1, National Police Accountability Project (“NPAP”) hereby certifies it does not have any parent companies, subsidiaries, or affiliates that have issued shares or debt securities to the public. NPAP is a nonprofit organization committed to protecting the human and civil rights of individuals in their encounters with law enforcement and detention facility personnel. NPAP aims to promote the accountability of law enforcement officers and their employers for violations of the Constitution and the laws of the United States. To that end, NPAP pursues litigation and advocacy efforts to increase transparency and accountability in policing. NPAP’s attorney members request and rely upon state public records requests and Freedom of Information Act (“FOIA”) requests as a part of their civil rights litigation practices. NPAP regularly appears as *amicus curiae* before federal and state courts.

NOTICE OF INTENT TO FILE *AMICUS CURIAE* BRIEF

Pursuant to Federal Rule of Appellate Procedure 29(a) and Circuit Rule 29(b), NPAP represents that it intends to file an *amicus curiae* brief in this case on behalf of itself. Counsel for Appellant and Appellee have consented to the filing of such a brief by NPAP. NPAP intends to file its brief no later than March 6, 2024, in accordance with Circuit Rule 29(c).

Dated: February 28, 2024

Respectfully submitted,

/s/ Keisha James

Keisha James
PO Box 56386
Washington, DC 20040
keisha.npap@nlg.org
(202) 557-9791

Lauren Bonds
Eliana Machefsky
National Police Accountability Project
1403 Southwest Boulevard
Kansas City, Kansas 66103
legal.npap@nlg.org
fellow.npap@nlg.org

Counsel for Amicus Curiae

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2024, I electronically filed the above Notice of Intent to File *Amicus Curiae* Brief in Support of Plaintiff-Appellant and Reversal with the United States Court of Appeals for the District of Columbia Circuit using the CM/ECF system, and service will be accomplished through the appellate CM/ECF system.

Dated: February 28, 2024

/s/ Keisha James
Keisha James

Counsel for Amicus Curiae